

# POMERANTZ LLP

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Partner

June 1, 2021

**Via ECF**

Hon. Brantley Starr  
United States District Judge  
United States District Court  
Northern District of Texas  
1100 Commerce Street, Room 1528  
Dallas, TX 75242

Re: *Chun v. Fluor Corp., et al.*, Case No. 3:18-cv-01338-X

Dear Judge Starr:

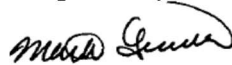
I write as Court-appointed Co-Lead Counsel in the above-captioned securities class action matter on behalf of all parties to respectfully request a docket Order staying all deadlines until August 19, 2021, to accommodate the parties' efforts at a potential resolution.

Recently, Your Honor granted in part and denied in part Defendants' second motion to dismiss. *See* Order of May 5, 2021 (Dkt. No. 140). Thereafter, Your Honor ordered the parties to meet and confer regarding both a proposed scheduling and discovery order and potential settlement. *See* Order of May 24, 2021 (Dkt. No. 142). That Order set a deadline of July 19, 2021, for the parties to submit their proposal.

The parties have conferred and believe, in accordance with the Court's guidance and direction, that a private mediation would be productive at this juncture. The parties are in the process of selecting a mutually acceptable mediator, at which point they will schedule a mediation, with customary antecedent steps and written submissions. Counsel for the parties have various professional and personal conflicts during July 2021. As such, the parties expect that a mediation process will extend into mid-August 2021.

Given the foregoing, the parties respectfully request that the Court enter a docket order staying all deadlines in the above-captioned matter until August 19, 2021, at which point the parties will provide the Court with an update as to their resolution efforts.

Respectfully submitted,



Matthew L. Tuccillo